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<b>TRANSMITTAL FORM</b>  (to be used for all correspondence after initial filing)	Application Number	09/209,015	
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	First Named Inventor	Abramson	
	Art Unit	2178	
	Examiner Name	Hong, Stephen S	
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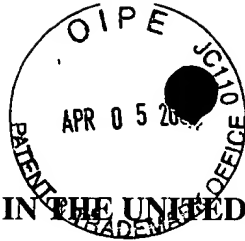
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants: Nathan Abramson et al.

Serial No.: 09/209,015

Filed: December 10, 1998

For: SYSTEM AND METHOD FOR AUTOMATIC MAPPING OF  
HYPERTEXT INPUT FIELDS TO SOFTWARE COMPONENTS

Examiner: Stephen S. Hong

Art Unit: 2178

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**APPELLANT'S REPLY BRIEF**

These remarks are responsive to the Examiner's Answer of February 24, 2004.

Introduction

As stated in the Appellant's Brief, a data handler, responsive to input data submitted by a user with an input field name, uses mappings in a name-space manager to associate the input field names with the appropriate component properties and calls an appropriate software component to process the input data. These mapping allows the software component to process the entered data regardless of the name of the input field in the hypertext documents.

Differences from Cited Apple Reference

The Apple reference relates to a method for integrating applets running on a client with the application logic for applications running on a server. The integration is specifically used for synchronizing state and for recognizing user actions in the browser. In contrast, claim 1 recites a method that includes "emitting program code for mapping input field names in the hypertext document to software component properties."

This mapping allows the software component to process the data in the input field, regardless of the spelling of the name of the input field in the hypertext document. In contrast, Apple uses an "Applet Code" tag that provides the source of the applet code; as shown on page

13, lines 16 – 20, the value “next.wof.widgets.CalendarApplet.class” directs the browser to the location of the Calendar Applet code. If the source is misspelled or incorrectly provided, the browser will not be able to locate the Applet code or load an Applet. Therefore, the method and apparatus taught by Apple requires that the spelling of the applet source code be exact in order for the data synchronization to occur, and does not allow “the software component [to] process the input field data regardless of the spelling of the name of the input field in the hypertext document.” (Claim 1).

The Examiner’s comments suggest that the Examiner does not disagree with the difference, but is contending that the claims do not adequately reflect this difference. Applicants contend that the claim language does sufficiently distinguish. However, if the reading of the Examiner’s inference is correct that there is a difference and it needs to be better reflected in the claims, applicants would urge the Examiner to contact counsel listed below to amend with the appropriate language.

#### Response to Examiner’s Answer

Turning the to Examiner’s reading of claim 1, the Examiner quotes from the subparagraph that begins with “calling the software component for processing”, and from this “submit[s] that the claim only calls for any ‘processing’ without explicitly requiring what this processing must be” (Examiner’s Answer, page 4).

The “mapping” at line 10 of claim 1 also refers back to the “mapping” in line 2, where it states that the program code is for “mapping input field names in the hypertext document to software component properties when the hypertext document is rendered.”

The Examiner takes the position that processing can be done in another system, such as Apple, regardless of the name because there are no restrictions in the Apple document for what the name might be. In other words, it appears to be the Examiner’s contention that while Apple does not teach or suggest what Applicants intended to claim, because the input field name could be LAST\_NAME or DATE, this means that a mapping can be done regardless of the name.

In the claimed method, however, it states that the “software component can process the input field data regardless of the spelling of the name of the input field.” The name of the input

field is associated with the component property. Using the example from the specification, if the input field in the document is LST\_NAME and the component property expects LAST\_NAME, a different system such as Apple could not handle the data that is being provided, but the present application could. Consequently, the software component cannot process “regardless of the input field name” in such another system such as Apple, because it can only process for one input field name -- the correct name.

The Examiner thus ignores the connection that is established between the input field name and the software component as expressed in the subparagraphs that begin with “rendering”, “determining”, and “calling.”

### Grouping of Claims

The Examiner indicates that claims 1-4 and 9-17 stand or fall together because there is no statement that the grouping of claims does not stand or fall together and reasons and support thereof. Applicants disagree.

In the grouping of claims section of the brief, three groups of claims are set out as being argued separately. The text of the brief also makes it clear that three groups of claims are separately being argued. Furthermore, the text of the brief makes it absolutely clear that these claims were grouped for separate patentability independent of the patentability of other claims. For example, with respect to claims 2-4, there is a separately captioned heading that it is a separate group, and it includes the following statements:

Claims 2 - 4 are being treated as a group because they specifically pertain to hypertext form tags or a hypertext input form, and are patentable regardless of the patentability of claim 1...For at least these reasons, claims 2 - 4 are separately patentable over Apple.

Furthermore, with respect to other claims:

“Claims 9 - 11, 13 - 15, and 17 have been grouped together because they are related to input field data and input field names. These claims have additional limitations not taught by the cited reference, regardless of any disposition of claim 1, 12, or 16.”

Consequently, while the phrasing does not include the literal words "stand or fall together", these statements clearly indicate that these claims do not stand or fall together, and should be considered separately on the merits.

**Conclusion**

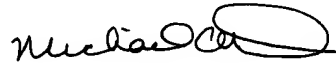
All claims should now be in condition for allowance and accordingly a notice of allowance is respectfully requested.

Again, as indicated above, if the Examiner contends that the claim would be patentable with clarifying language, the undersigned would welcome any dialog toward a resolution.

The Commissioner is hereby authorized to charge any fees now required to maintain the pendency of the application, to Deposit Account No. 08-0219.

Respectfully submitted,

Date: April 1, 2004



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